



DEPT. OF TRANSPORTATION  
DOCKETS

Washington National Headquarters  
880 South Pickett Street  
Alexandria, VA 22304  
703-823-9550 Fax: 703-461-2847

2003 MAR 27 12:21  
March 27, 2003

Docket Management Facility (USCG-2003-14359) - 3  
U.S. Department of Transportation  
Room PL-401  
400 Seventh St., N.W.  
Washington, DC 20590-0001

Dear Sir or Madam:

BoatU.S., a consumer organization with over 535,000 members, has a deep and longstanding interest in U.S. Coast Guard programs that effect the safety of recreational boaters. Of particular concerns are the regulations addressing the defect notification process, manufacturer certification and the manufacturing standards for boats and associated equipment that are now being reviewed by the Coast Guard under the Regulatory Flexibility Act.

It is our understanding that these regulations are being examined relative to their economic impact on small marine businesses.

Boat manufacturing regulations, made law in 1971 by the passage of the Federal Boat Safety Act, were written broadly because of the wide variety of designs, materials and uses of recreational vessels. They address just a few areas, including hull identification numbers, maximum capacities for weight, passengers and horsepower, flotation, fuel and electrical systems and ventilation — and some apply only to boats under 20 feet. In the absence of more comprehensive federal regulations, many larger marine manufacturers rely on in-house engineering personnel and non-governmental organizations like the American Boat & Yacht Council for technical guidance.

In recent years, the Coast Guard revived its factory visit program in part to provide small businesses with the technical know-how to meet federal regulations. In fact, information gathered through the program has shown that small manufacturers are the ones most likely to misinterpret or fail to implement the federal safety regulations that govern their businesses. The program has also found that builders of non-traditional vessels, like houseboats, are also likely to overlook safety considerations in their designs, often with tragic result. Deaths caused by carbon monoxide poisoning due to the exhaust designs common to hundreds of houseboats were described in horrific detail at recent Congressional hearings. As a result, the federal recall statute for boats has been extended to 10 years.

Despite the recent carbon monoxide deaths, boating fatalities caused by manufacturing defects have been reduced dramatically since 1971 because most manufacturers have embraced the Coast Guard's regulations. Let's make sure this trend continues.

BoatU.S. believes that any reduction in Coast Guard safety and manufacturing regulations would expose recreational boaters to risks Congress and the boating public deemed unacceptable over 30 years ago. We therefore recommend against the Coast Guard diminishing any provision of the defect notification process, manufacturer certification requirements or the manufacturing standards for boats and associated equipment.

Sincerely,

Caroline Ajootian, AVP  
Director, Consumer Protection Bureau